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Attorneys for Plaintiffs
TACSIS APC and KENT LIMSON

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TACSIS APC, a California corporation;
and KENT LIMSON, an individual,

Plaintiffs
v.

JACKIE ROBINSON, an individual; ALL
NET LAND DEVELOPMENT, LLC, a
Nevada Limited Liability Company; ALL
NET, LLC, a Nevada Limited Liability
Company; DRIBBLE DUNK, LLC, a
Nevada Limited Liability Company; AGS
ASSURETY, LLC, a Nevada Limited
Liability Company; TIMOTHY J.
ARELLANO, an individual; DAVID
LOWDEN, an individual; MESSNER
REEVES LLP, a Colorado Limited
Liability Partnership; TORBEN WELCH,
an individual; LORING JACOBS, an
individual, and DOES 1 THROUGH 100
INCLUSIVE,

Defendants.

Case No: 2:24-cv-02284-RFB-EJY

**STATUS REPORT TO COMPLY WITH
RULE 26(f)**

1 Plaintiffs TACSIS APC and KENT LIMSON submits this report pursuant to their
2 obligations under Fed. R. Civ. P. 26(f)(1).

3 1. Plaintiffs filed their Complaint on December 10, 2024. *See* Dkt. No. 1. Defendants ALL
4 NET LAND DEVELOPMENT LLC And DAVID G. LOWDEN moved to dismiss under Federal
5 Rule of Civil Procedure 12(b) on January 17, 2025. *See* Dkt. No. 13. Briefing on the Motion to
6 Dismiss was completed on January 31, 2025. *See* Dkt. No. 31.

7 2. Plaintiffs have made multiple attempts to convene a Federal Rules of Civil Procedure
8 26(f) conference. However, only Ryan Daniels, counsel for JACKIE ROBINSON, ALL NET
9 LLC, DRIBBLE DUNK LLC and LORING JACOBS agreed to meet. All other counsel refused
10 to meet citing that the conference was premature and have taken the position, and continue to take
11 the position, that they will not participate in a Rule 26 conference until after the Court's ruling on
12 the Motion to Dismiss.

13 3. Rule 26(f) provides: "Except in a proceeding exempted from initial disclosure under Rule
14 26(a)(1)(B) or when the court orders otherwise, the parties must confer as soon as practicable –
15 and in any event at least 21 days before a scheduling conference is to be held or a scheduling
16 order is due under Rule 16(b)." FED. R. CIV. P. 26(f)(1). "The attorneys of record and all
17 unrepresented parties that have appeared in the case are jointly responsible for arranging the
18 conference, for attempting in good faith to agree on the proposed discovery plan, and for
19 submitting to the court within 14 days after the conference a written report outlining the plan."
20 FED. R. CIV. P. 26(f)(2).

21 4. For the foregoing reasons, Plaintiffs file the within status report and respectfully requests
22 that the Court compel Defendants to participate in a Rule 26(f) conference, or, in the alternative,
23 schedule an initial scheduling conference in this matter.

24 DATE: February 18, 2025

Respectfully submitted,

25 **TACSIS LAW APC**

26
27 By: /s/ John S. Manzano
28 John S. Manzano, Esq.
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

Pursuant to Federal Rules of Civil Procedure 5 and Local Rule 5-1, I certify that I am an employee of TACSIS LAW APC, and that on February 18, 2025, the foregoing **STATUS REPORT TO COMPLY WITH RULE 26(f)**, was served upon the following respective parties via CM/ECF system as follows:

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/s/: Nancy Steelman
An Employee of TACSIS LAW APC